

5 9/18/07 SDNY [Signature]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RITCHIE CAPITAL MANAGEMENT, L.L.C.,
RITCHIE RISK-LINKED STRATEGIES
TRADING (IRELAND), LIMITED, RITCHIE
RISK-LINKED STRATEGIES TRADING
(IRELAND) II, LIMITED, WALKERS SPV
LIMITED, as trustee for Ritchie Risk-Linked
Strategies Trust I and Ritchie Life Strategies
Master Trust, and RITCHIE RISK-LINKED
STRATEGIES TRADING, LTD.,

Plaintiffs,

v.

COVENTRY FIRST LLC, THE COVENTRY
GROUP, INC., MONTGOMERY CAPITAL,
INC., LST I LLC, ALAN BUERGER,
CONSTANCE BUERGER, REID S.
BUERGER, ANTONIO MUNIZ, ALEX
SELDIN, NEAL JACOBS, EILEEN SHOVLIN,
and JIM DODARO,

Defendants.

Civil Action No. 07CV3494
(DLC)(DCF)

ECF Case

MOTION TO ADMIT ALISON C. BARNES PRO HAC VICE

PURSUANT TO RULE 1.3(c) of Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and upon my annexed declaration, I, Rachel S. Li Wai Suen, a member in good standing of the bar of this Court, hereby move for an order allowing the admission *pro hac vice* of:

Alison C. Barnes
Robbins, Russell, Englert, Orseck & Untereiner LLP
1801 K Street, N.W., Suite 411
Washington, D.C. 20006
Tel: (202) 775-4500
Fax: (202) 775-4510

62-7383 \$25 9-19-07 MG

Ms. Barnes is a member in good standing of the bars of the District of Columbia and Georgia. There are no pending disciplinary proceedings against Ms. Barnes in any State or Federal Court.

Dated: September 13, 2007
Washington, D.C.

Respectfully submitted,

By:



Rachel S. Li Wai Suen (RS 1145)
ROBBINS, RUSSELL, ENGLERT, ORSECK
& UNTEREINER
1801 K Street, N.W., Suite 411
Washington, D.C. 20006
Tel: (202) 775-4500
Fax: (202) 775-4510

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____)	
RITCHIE CAPITAL MANAGEMENT, L.L.C.,)	
RITCHIE RISK-LINKED STRATEGIES)	
TRADING (IRELAND), LIMITED, RITCHIE)	Civil Action No. 07CV3494
RISK-LINKED STRATEGIES TRADING)	(DLC)(DCF)
(IRELAND) II, LIMITED, WALKERS SPV)	
LIMITED, as trustee for Ritchie Risk-Linked)	ECF Case
Strategies Trust I and Ritchie Life Strategies)	
Master Trust, and RITCHIE RISK-LINKED)	
STRATEGIES TRADING, LTD.,)	
)	
Plaintiffs,)	
v.)	
)	
COVENTRY FIRST LLC, THE COVENTRY)	
GROUP, INC., MONTGOMERY CAPITAL,)	
INC., LST I LLC, ALAN BUERGER,)	
CONSTANCE BUERGER, REID S.)	
BUERGER, ANTONIO MUNIZ, ALEX)	
SELDIN, NEAL JACOBS, EILEEN SHOVLIN,)	
and JIM DODARO,)	
)	
Defendant.)	
_____)	

**DECLARATION OF RACHEL S. LI WAI SUEN IN SUPPORT OF
MOTION TO ADMIT ALISON C. BARNES *PRO HAC VICE***

I, RACHEL S. LI WAI SUEN, declare as follows:

1. I am an associate in the law firm of Robbins, Russell, Englert, Orseck & Untereiner LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Alison C. Barnes as counsel *pro hac vice*.

2. I am a member in good standing of the bars of the State of New York and the District of Columbia. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Ms. Barnes is a partner in the law firm of Robbins, Russell, Englert, Orseck & Untereiner LLP.

4. Ms. Barnes is a member in good standing of the bars of the District of Columbia and the state of Georgia. Attached to this declaration as exhibits A and B are certificates issued within the last 30 days indicating that Ms. Barnes is a member in good standing of each of these two bars.

5. Ms. Barnes is a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with, among other things, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the local rules governing practice in this court, and the Judicial Code governing practice in the United States district courts.

6. For the foregoing reasons, I respectfully request the *pro hac vice* admission of Alison C. Barnes.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 13, 2007
Washington, D.C.

A handwritten signature in black ink, appearing to read 'Rachel S. Li Wai Suen', written over a horizontal line.

Rachel S. Li Wai Suen (RS 1145)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____)	
RITCHIE CAPITAL MANAGEMENT, L.L.C.,)	
RITCHIE RISK-LINKED STRATEGIES)	
TRADING (IRELAND), LIMITED, RITCHIE)	Civil Action No. 07CV3494
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SELDIN, NEAL JACOBS, EILEEN SHOVLIN,)	
and JIM DODARO,)	
)	
Defendant.)	
_____)	

[PROPOSED] ORDER FOR ADMISSION OF ALISON C. BARNES
PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Rachel S. Li Wai Suen, attorney for Plaintiffs, and said sponsor attorney's declaration in support, it is

ORDERED that	Alison C. Barnes
	Robbins, Russell, Englert, Orseck & Untereiner LLP
	1801 K Street, N.W., Suite 411
	Washington, D.C. 20006
	Tel: (202) 775-4500
	Fax: (202) 775-4510
	Email: abarnes@robbinsrussell.com

is admitted to practice *pro hac vice* as counsel for plaintiffs in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac fee to the Clerk of Court.

SO ORDERED.

Dated:
New York, New York

United States District Judge



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

ALISON C. BARNES

was on the 14TH day of NOVEMBER, 2003
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
September 12, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

Exhibit B

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Ms. Alison Courtney Barnes
Robbins Russell Englert Orseck & Untereiner LLP
1801K Street N.W., Suite 411
Washington, DC 20006

CURRENT STATUS: Inactive Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 11/24/1997

Attorney Bar Number: 038549

Today's Date: September 10, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100
Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
FAX (404) 527-8717
www.gabar.org

SOUTH GEORGIA

244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435

CERTIFICATE OF SERVICE

I hereby certify that on September 13th, 2007, I caused a copy of the Motion to Admit Alison C. Barnes *Pro Hac Vice*, the Declaration of Rachel S. Li Wai Suen in Support of Motion to Admit Alison C. Barnes *Pro Hac Vice*, and the Proposed Order for Admission of Alison C. Barnes *Pro Hac Vice* to be served on defendants by mailing to:

Dane H. Butswinkas
Robert Cary
David Forkner
Kenneth Brown
Katherine Lindsey
Rachel Shanahan
Thomas Windom
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, NW
Washington, DC 20005

A handwritten signature in black ink, appearing to read 'RLS', is written over a horizontal line.

Rachel Li Wai Suen